

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES of the CHICAGO REGIONAL COUNCIL)
OF CARPENTERS PENSION FUND, CHICAGO)
REGIONAL COUNCIL OF CARPENTERS WELFARE)
FUND, CHICAGO REGIONAL COUNCIL OF)
CARPENTERS APPRENTICE & TRAINEE FUND)
)
Plaintiffs,) Case No. 08 C 359
)
) Judge Valdez
v.)
)
LONGSHORE / DALY INC.)
)
Defendant.)

AGREED MOTION FOR ENTRY OF JUDGMENT

The parties, by its respective attorneys, Daniel P. McAnally and Thomas S. Moore, move this Honorable Court to enter an Agreed Judgment Order in favor of the plaintiffs and against the defendant and in support state:

1. This is an ERISA trust fund case for outstanding contributions.
2. The parties agree that a judgment should be entered in favor of the plaintiffs and against the defendant as follows:

a)	ERISA Contributions (10/07 - 01/08)	\$127,531.84
b)	Interest on ERISA Contributions (10/07 - 01/08)	\$5,382.06
c)	Liquidated Damages (11/06 - 01/08)	\$40,696.84
d)	Attorney Fees and Costs	\$7,908.25
TOTAL		\$181,518.99

WHEREFORE, the parties request that their motion be granted in favor of the plaintiffs and against the defendant in the amount of \$181,518.99.

Respectively submitted,

s/ DANIEL P. McANALLY

Attorney for the Trustees of
the Chicago Regional
Council of Carpenters
Pension Fund, et al.

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